

EXHIBIT A

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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ANIMAL SCIENCE PRODUCTS, INC.
2864 FM 1275
Nacogdoches, TX 75961

RESCO PRODUCTS, INC.
2 Penn Center West
Pittsburgh, PA 15276,

Plaintiffs,

— v. —

**CHINA NATIONAL METALS &
MINERALS IMPORT & EXPORT
CORPORATION**
5 Sanlihe Road, Haidian,
Beijing, China 100101

MINMETALS, INC.
120 Schor Avenue
Leonida, NJ 07605

**CHINA NATIONAL MINERALS IMPORT
& EXPORT CORPORATION**
Bldg 15 Block 4 Anhui Li, Chaoyang,
Beijing, China 100101

XIYANG GROUP
Xiyang Mansion, Yingluo Town, Liaoning,
Haicheng, China 114200

**XIYANG (PACIFIC) IMPORT & EXPORT
LTD. COMPANY**
Bin Guan, Xiyang Steel & Iron Headquarters
Haicheng, Liaoning, China 114200

Case No. _____
CLASS ACTION COMPLAINT
JURY TRIAL DEMAND

**XIYANG REFRACTORY MATERIALS
LTD. COMPANY**

Yinlou Town
Liaoning, Haicheng China 114300

**XIYANG FIREPROOF MATERIAL CO.
LTD.**

Yinglou Town, Liaoning,
Haicheng, China 114213

SINOSTEEL CORPORATION

17B Xichang'an Street, West District
Beijing, China 100031

**CHINA METALLURGICAL IMPORT &
EXPORT CORPORATION**

17B Xichang'an Street, West District
Beijing, China 100031

**LIAONING JIAYI METALS & MINERALS
CO., LTD.**

1 Gangwan Plaza, Zhongshan/
18/F NO.15 Renmin Road
Dalian, China 116001

**LIAONING FOREIGN TRADE GENERAL
CORPORATION**

2 Hongyan Street, Xiyang District
Dalian, China 116001

**LIAONING JINDING MAGNESITE
GROUP**

Nanlou Economic Development District,
Liaoning, Dashiqiao, China 11503

**DALIAN GOLDEN SUN IMPORT &
EXPORT CORP.**

11F Fortune Mansion, 18 Shiji Street, Liaoning,
Dalian, China 116001

HAICHENG HOUYING CORP. LTD.

Wanke Dongyuan Building No. 2015
Liaoning, Anshan, China 114002

**HAICHENG HUAYU GROUP IMPORT &
EXPORT CO. LTD. (HUAZIYU)**

Hua Zi Yu Village, Bali Town, Liaoning
Haicheng, China

**HAICHENG PAILOU MAGNESITE ORE
CO. LTD.**

Pailou Town, Haicheng,
Anshan, China 114207

YINGKOU HUACHEN (GROUP) CO. LTD.

Fenshui, Dashiqiao, Liaoning, China 115100

Defendants.

COMPLAINT FOR ANTITRUST VIOLATIONS

Plaintiffs, by and through their undersigned attorneys, bring this **class** action on their own behalf and all others similarly situated for treble damages and injunctive relief under the antitrust laws of the United States against the above-named defendants, demanding a trial by jury. **For their Complaint against defendants, plaintiffs allege the following upon information and belief:**

I. NATURE OF THE ACTION

1. This action arises out of a conspiracy among all defendants and their co-conspirators with the purpose and effect of fixing prices **and controlling the supply** of magnesite and magnesite products to be exported to the United States **and worldwide**, and committing other unlawful practices designed to inflate the prices of magnesite and magnesite products to plaintiffs and other purchasers in the United States and elsewhere. **In particular, the above-named defendants' acts related to price-fixing and supply restraints in the distribution and sale of magnesite and magnesite products** constitute per se violations of Section 1 of the Sherman Act, 15 U.S.C. § 1.

2. **Defendants have established an illegal cartel – currently named the Chinese Magnesite Forum – that is ongoing today and that** has deliberately targeted and severely burdened consumers in the United States. The conspiracy has existed at least **during the period** from April 2000 to date. The cartel has affected tens of millions of dollars of commerce in products found in manufacturing facilities and in American households. The conspiracy has included communications and meetings in which defendants have agreed to limit competition, control supply, and increase prices for magnesite and magnesite products.

II. JURISDICTION AND VENUE

3. Plaintiffs bring this action under Sections 4 and 16 of the Clayton Act, 15 U.S.C. §§ 4 and 16, to obtain injunctive relief and to recover treble damages and the costs of suit, including